REMARKS

This paper is being submitted in response to the Office Action mailed in the application on June 6, 2005. Claims 1-6, 10-27, 31-40 and 43 are pending. Independent claims 1, 22, 39, 40 and 43 have been amended.

The Examiner has rejected applicant's claims 1-6, 9-16, 19-27, 30-37 and 39-43 under 35 U.S.C. § 103(a) as being unpatentable over Patton et al. (U.S. Patent No. 6,408,301) in view of Jernigan, IV et al. (U.S. Patent No. 5,574,907) further in view of Srivastava et al. (U.S. Patent No. 6,549,922). The Examiner has rejected applicant's claims 17 and 18 under 35 U.S.C. § 103(a) as being unpatentable over the Patton et al. patent in view of Jernigan, IV et al. further in view of Srivastava et al. as applied to claims 1-6, 9-16, 19-27, 30-37 and 39-43, and further in view of Levy et al. (U.S. Patent No. 6,505,160). Insofar as claims 9, 30, 41 and 42 were cancelled in a previously filed amendment, as acknowledged by the Examiner in paragraph 1 of the Detailed Action, the Examiner's rejection of such claims is moot. With respect to applicant's pending claims, as amended, the Examiner's rejections are respectfully traversed.

With respect to the Examiner's rejection of independent claims 1, 22, 39, 40 and 43, applicant's independent claims have been amended to better define applicant's invention. Particularly, applicant's independent claims 1, 39 and 40, which are directed to an information processing method, control program and storage medium, respectively, have been amended to recite a first storage step of storing metadata of a read file into a first block storage area that is a predetermined continuous area capable of storing metadata of the plurality of files on the storage medium. Applicant's independent claims 22 and 43, which are directed to an

information processing apparatus for storing a plurality of files having both content data and metadata related to the content data, have been similarly amended.

According to the Examiner, the cited Patton et al. patent discloses an information processing method for storing binary data and metadata related to the binary data into a storage medium, comprising "a first storage step of storing said metadata of the plurality of files into a first block storage area that is a continuous area capable of storing metadata of the plurality of files on said storage medium" (FIG. 1; col. 4, lines 20-28). The Examiner also states that Patton et al. disclose a second storage step and third storage step, wherein the "binary data" corresponds to "still image data," "second storage area" corresponds to the area in which image data is stored, and "link information" corresponds to "image links" and is stored in disk 16 as shown in FIG. 3 and therefore must be stored adjacent the metadata. The Examiner further argues that while Patton et al. do not specifically disclose the order of storing the binary data, metadata and linking data, a specific choice of sequence would have been obvious to one of ordinary skill in the art.

The Examiner also acknowledges that Patton et al. do not teach that the storage area is a continuous area. According to the Examiner, the Jernigan, IV et al. patent discloses a method for defragmenting file data stored on a disk, in two stages in which linking information (FAT and MDFAT) are rearranged into adjacent variable length clusters with no intervening vacant sectors. The Examiner concludes that it would have been obvious to one with ordinary skill in the art at the time the invention was made to store metadata, binary data and linking information in a continuous area "because it is desirable to defragment the disk such that all files are stored in contiguous clusters."

The Examincr acknowledges that the combination of Patton et al. and Jernigan, IV et al. fails to disclose the steps of reading the file, determining whether the file includes metadata, and separating the metadata and the content file. According to the Examiner, Srivastava et al. disclose a system for collecting and managing media metadata comprising the steps of reading the file, determining whether the file includes metadata, and separating the metadata and the content file (FIG. 1; claim 1), or more particularly, parsing the media file to extract the metadata embedded within the file (col. 2, lines 45-48). The Examiner concludes that it would have been obvious to one with ordinary skill in the art at the time the invention was made to apply the teaching of Srivastava et al. into the combined system of Patton et al. and Jernigan, IV et al., because the combination would speed up the processing of the file and allow the user, in searching for information, to need to only search the metadata and not the entire file. Applicant respectfully disagrees.

Applicant's invention is characterized by separating each file into content data and metadata, and separately storing the set of content data and the set of metadata of a plurality of files into different contiguous storage block areas, as shown in FIG. 5. In particular, a set of metadata of a plurality of files is stored into a predetermined continuous area or first block storage area (503), and a set of content data of the plurality of files is stored into a second storage area of the storage medium. Link information is stored adjacent to the metadata to which such link information corresponds, as shown in FIG. 10. Continuous storage of the metadata of the plurality of files in the predetermined metadata storage area 503 enables high speed searching when metadata is referred to in the search processing (Page 9, line 17-Page 10,

line 12), and the storage of link information adjacent to the corresponding metadata enables corresponding content data to be easily specified.

Applicant submits that the cited Patton et al. patent, either alone or in combination with the Jernigan, IV et al. or Srivastava et al. patents, does not teach or suggest the information processing method, apparatus, control program or storage medium of applicant's amended independent claims. In particular, applicant's invention as recited in claims 1, 22, 39, 40 and 43 requires reading a file, determining whether the read file includes metadata, and separating the read file into metadata and content data if it is determined in the determining step that the read file includes metadata. Applicant's amended claims further require storing metadata of the read file into a first block storage area that is a predetermined continuous area capable of storing metadata of the plurality of files on the storage medium. Such features are not taught or suggested by the cited patents.

As acknowledged by the Examiner, Patton et al. does not teach or suggest that the storage area for metadata is a continuous area, as required by applicant's claims. Applicant further submits that Patton et al. does not teach that such first storage area is a predetermined area, as required by applicant's amended claims. Patton et al. further fail to teach or suggest the steps of reading a file, determining whether the read file includes metadata, separating the read file into metadata and content data and storing such data sets in separate areas.

The Jernigan, IV et al. patent teaches a method for defragmenting file data stored on a disk. In particular, according to the Jernigan patent, file data is stored in the first available vacant space and leftover data is stored in the next available vacant space. If the next available vacant space is located at a distant portion of the disk, the file data may be stored in several

non-adjacent clusters at various locations on the disk. (Col. 4, lines 14-28). Thus, Jernigan teaches defragmentation by a two-stage process wherein data (FAT and MDFAT) is rearranged into adjacent clusters and moved into adjacent variable-length clusters. (Col. 8, lines 36-49).

There is no teaching or suggestion in the Jernigan patent that such clusters comprise a predetermined continuous first storage area, as required by applicant's claims. Moreover, by "defragmenting," the system and method taught by Jernigan, IV et al. stores file data in adjacent sectors, but does not teach or suggest separating the file data into metadata and content data. The Jernigan patent therefore also fails to teach or suggest storing metadata in a first area that is a predetermined continuous area, and storing content data in a second area other than the first area, as required by applicant's amended claims. Furthermore, the FAT and MDFAT data taught by Jernigan define the cluster chain of a file, but do not comprise linking information that links metadata stored in a first storage area with content data stored in a second storage area, as required by applicant's claims.

As acknowledged by the Examiner, the combination of Patton and Jernigan fails to disclose the steps of reading a file, determining whether the read file includes metadata, and separating the read file into content data and metadata, all required by applicant's independent claims. According to the Examiner, Srivastava et al. discloses a system for collecting and managing media metadata comprising the steps of reading the file, determining whether the read file includes metadata, and separating the read file into metadata and the content data.

As shown in FIG. 1 of Srivastava et al., the system parses the media data file to extract metadata (111) embedded within the file, obtains additional metadata by auxiliary processing through the internet (117), and generates a summary of the media data (121) which is formatted

(119) into a standard format such as XML and mapped (123) into a database (125). Such extracting of embedded metadata does not teach or suggest separating a file into two portions, namely metadata and content data, much less storing the two separated portions of metadata and content data in separate first and second areas. Applicant further submits that Srivastava et al. further fail to teach or suggest a storing metadata in a first storage area that is a predetermined continuous area on the storage medium, as required by applicant's amended claims.

In view of the above, it is submitted that applicant's claims 1, 22, 39, 40 and 43, as amended, and their respective dependent claims, all patentably distinguish over the cited art of record. With respect to claims 17 and 18, the cited Levy et al. patent adds nothing to change this conclusion. Accordingly, reconsideration of the claims is respectfully requested.

Applicant has also included herewith a Request for a Telephone Interview, requesting that the examiner permit applicant's undersigned attorney to conduct a telephone interview with the examiner to discuss the subject Amendment and application, in the event the examiner is still not persuaded to allow the application.

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Respectfully submitted,

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